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May 6, 2024

Via ECF

Judge Eric N. Vitaliano
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: Lieberman v. C.A. Goldberg, PLLC, & Carrie A. Goldberg
1:21-cv-05053-ENV-RER**

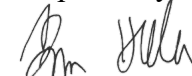
Dear Judge Vitaliano:

I represent the Plaintiff in the above-referenced action. As I did on November 8, 2023, and February 8, 2024, I write to respectfully follow up with the Court on two outstanding motions in this case, namely: (1) Plaintiff's motion to dismiss the counterclaim of Defendant C.A. Goldberg, PLLC, which was filed on September 12, 2022; and (2) Defendants' motion for summary judgment, which was filed on September 16, 2023.

Plaintiff respectfully requests a conference to inquire if there is any additional information that the Court requires to address these motions, which have been pending for almost 20 months. Defense counsel consents to, but does not join in, this request.

We thank the Court for its consideration of this matter.

Respectfully,



BRIAN HELLER

cc: All counsel – via ECF